



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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JUN 27 2006

Suzy Stutzman, Lead Planner
National Park Service
Intermountain Region
12795 West Alameda Parkway
P.O. Box 25287
Denver, CO 80225-0287

RE: Great Sand Dunes National Park and
Preserve, General Management Plan and
Wilderness Study Draft EIS, Alamosa and
Saguache Counties, Colorado

Dear Ms. Stutzman:

The Environmental Protection Agency (EPA) Region 8 has reviewed the Draft Environmental Impact Statement (DEIS) for the General Management Plan (GMP) and Wilderness Study for the Great Sand Dunes National Park and Preserve. The following comments are provided in accordance with our responsibilities and authorities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

The purpose of the plan is for this recently-designated National Park to manage its resources in a manner that will preserve them unimpaired for future generations, while also providing opportunities for visitor use and enjoyment. Some aspects of the Park Service's Preferred Alternative include recommendation for wilderness status for the northeastern portion of the Park known as the Dunefield Focus, and limiting access to the Big Spring and Little Spring areas to guided public access, while maintaining one existing visitor center as the main access route into the Park and Preserve.

Water Resources and Wetland Management We concur with the Preferred Alternative presented in the GMP that if the Medano Ranch lands are transferred to the Park Service, surface irrigation for bison forage would be discontinued. Restoration of Sand, Big Spring, and Little Spring Creeks could be enhanced if the flow is allowed to remain within their natural drainage rather than being redirected to irrigate hay meadows. The elimination of the current irrigation practice could be designed to mimic pre-existing riparian conditions. We suggest the Final EIS further define the proposed study of this change in water flow management. The study should investigate whether other unimpaired stream(s) in a similar ecosystem could be identified and used to establish these management goals and objectives. We note that the proposed guided learning management zone is well suited to direct public access away from sensitive wetland

areas. These sensitive areas could be compacted by foot traffic or result in the introduction of non-native plant species if a less controlled visitor plan were adopted for the ecologically fragile lands surrounding Big and Little Springs.

Vegetation Management The Preferred Alternative presented in the GMP indicates that the Park Service would identify and manage nonnative plant species and possibly eliminate some nonnative plant stands. EPA supports this goal, as it is well recognized that nonnative species are a significant threat to maintaining sustainable ecological conditions. Methods used to control nonnative species include mechanical elimination, herbicide application or the introduction of beneficial insects. These controls are expensive and usually require repeated treatments over several seasons. EPA suggests that special attention be given to nonnative species in wetland and riparian areas, as these ecosystems are rare and highly valued by the visitor. Canadian thistle (*Cirsium arvense*), leafy spurge (*Euphorbia esula*), and whitetop (*Cardaria pubescans*) are perennial nonnative plants that can dominant wetland areas and exclude all native plant species. The Final EIS could provide further information about the available budget, methods, and priorities for controlling nonnative species on and adjacent to the Park and Preserve.

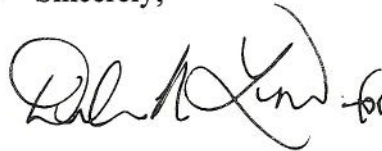
Elk Management According to the Forest Service and the Colorado Division of Wildlife there is a significant overpopulation of elk in the Sangre de Cristo range with rapid habitat degradation in portions of the Sangre de Cristo Wilderness. Some recommendations provided by the Forest and DOW would eliminate the Dunefield Focus area from wilderness recommendation and make it a national preserve in order to allow public hunting or DOW-administered hazing to prevent concentration of elk. We recognize that the Park Service plans a 3-year study of elk management to study its options to resolve the problem of excessive numbers of elk in the Park and adjacent Forest lands. However, public hunting access, especially if were to include vehicular access, into the Dunefield Focus area could undermine the objective to maintain that area unimpaired for future generations. Risks to the ecosystem due to hunter vehicular access include the spread of nonnative plant species, increased wildfire risk, and risks to public safety. We think the Preferred Alternative which will provide a route across the Park for hunter access to Forest lands where hunting is permitted is appropriate, but not a significant factor in reducing the 6000 elk in the San Luis Valley herd to a sustainable level. Consequently, we concur with the Park's intention to proceed with the Dunefield Focus Wilderness recommendation while the Park Service and DOW study means other than public hunting to control the elk herd size.

Tribal Consultation In March 2005, the Hopi Tribe indicated to the Park Service that the 'lakes' situated within the dunes are important to the Tewa people living on the Hopi Reservation. We suggest the Final EIS present the results, if any, of the Park Service's and the Hopi Tribe's consultation process and whether the Preferred Alternative presented in the GMP would adversely impact these areas of importance to these native people. There may be opportunities for the visitors to the guided learning management zone which includes Big Spring and Little Spring areas to understand the historical cultural value of these resources to the Tewa culture.

EPA evaluates the potential effects of a Proposed Action and the adequacy of information in a Draft EIS. The Park Service's Preferred Alternative is rated by EPA as "LO" under EPA's rating criteria, which is enclosed. The "LO" rating means that our review has indicated a lack of objections to the proposed action. We do suggest that the Final EIS include additional information about the change in irrigation management on the Medano Ranch, priorities for nonnative plant species management, clarify the ecological risks associated with hunter access in the Dunefield Focus area in response to recommendations provided by the Colorado Division of Wildlife and the Forest Service, and summarize the results of tribal consultations, especially with the Hopi Tribe.

Weston Wilson of my staff has coordinated EPA's comments. He can be reached at the address above, by telephone at (303) 312-6562, or by e-mail at wilson.wes@epa.gov. Thank you in advance for considering our comments.

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection
and Remediation

Enclosure:

cc: Peter Clark, Rio Grande National Forest, Monte Vista, Colorado
Leigh Kuwanwisiwma, Hopi Tribe, Kykotsmovi, Arizona

